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By ECF and Email

Hon. Cathy Seibel, U.S.D.J.
The Hon. Charles L. Brieant Jr.
300 Quarropas St.
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

Re: IBM v. Chantaruck, Case No. 7:23-CV-01191-CS (S.D.N.Y.)

Dear Judge Seibel:

We represent Plaintiff International Business Machines Corporation in the above-referenced action. We write pursuant to Your Honor's Individual Rules on behalf of both parties to jointly request a 45-day extension of Defendant's time to answer the Complaint from June 29, 2023 to August 14, 2023. This is Plaintiff's second request for an extension and the Court granted Plaintiff's previous request for extensions. The reason for the current request is that the parties have made substantial further progress in advanced settlement discussions towards a final resolution of this matter. However, due to the involvement of multiple parties located in Thailand and elsewhere, international logistics and court proceedings, and client schedules, the parties respectfully request additional time to finalize the settlement to avoid unnecessary use of judicial and party resources by exchanging pre-motion letters and responses.

Respectfully submitted,

/s/ James R. Levine

James R. Levine

c: All counsel of record by ECF